

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION

In re:	§	
	§	Case No. 21-31488-sgj11V
WATTSTOCK, LLC,	§	
	§	Chapter 11
Debtor.	§	Subchapter V
	§	
WATTSTOCK, LLC, Plaintiff,	§	
	§	Adv. No. 21-3083
v.	§	
	§	<i>Removed from the District Court</i>
ALTA POWER LLC, Defendant, Counter-Plaintiff,	§	<i>of Dallas County, Texas,</i>
and Third-Party Plaintiff,	§	<i>116th Judicial District</i>
	§	
v.	§	<i>Cause No. DC-20-08331</i>
	§	
WATTSTOCK, LLC, Counter-Defendant, and	§	
	§	
GENERAL ELECTRIC INTERNATIONAL, INC.,	§	
d/b/a GE POWER SERVICES, Third-Party	§	
Defendant.	§	

**PROPOSED ORDER GRANTING**  
**JOINT MOTION TO MODIFY SCHEDULING ORDER**

Before the Court is General Electric International, Inc. (“GE”) and Alta Power LLC’s  
 (“Alta”) Joint Motion to Modify Scheduling Order (Dkt. No. 49). The Court finds that good

cause exists for modifying the Scheduling Order and that no party will be prejudiced by doing so. Accordingly, the motion is GRANTED. It is hereby ORDERED that the following schedule of deadlines shall be in effect until further order of this Court:

<b>Event</b>	<b>Deadline</b>
Deadline for Parties to Serve Initial Disclosures	August 11, 2022
Deadline for Completion of Fact Discovery	October 28, 2022
Deadline for Production of Expert Reports for the Party With Burden of Proof	October 31, 2022
Deadline for Production of Opposing Expert Reports	January 5, 2023
Deadline for Production of Rebuttal Expert Reports	January 31, 2023
Deadline for Completion of Expert Discovery	February 21, 2023
Deadline to Complete Mediation with Agreed-Upon Neutral Mediator	February 28, 2023
Deadline for Summary Judgment Motions	March 15, 2023
Deadline for Oppositions to Summary Judgment Motions	April 15, 2023
Deadline for Reply Briefs in Support of Summary Judgment Motions	May 1, 2023
Deadline for <i>Daubert</i> Motions	May 15, 2023
Deadline for Oppositions to <i>Daubert</i> Motions	June 10, 2023
Deadline for Reply Briefs in Support of <i>Daubert</i> Motions	June 24, 2023
Hearing regarding (i) outstanding motions, if any; and (ii) whether case is ready for trial at district court	August 30, 2023

### END OF ORDER ###

**AGREED AS TO FORM:**

By: /s/ Joseph W. Golinkin II

**BAKER BOTTS L.L.P.**

Jessica B. Pulliam  
State Bar No. 24037309  
Jessica.pulliam@bakerbotts.com  
2001 Ross Avenue, Suite 900  
Dallas, Texas 75201-2911  
Tel. 214.953.6500

David R. Eastlake  
State Bar No. 24074165  
David.eastlake@bakerbotts.com  
910 Louisiana Street  
Houston, Texas 77002-4995  
Tel. 713.229.1234

-and-

**JORDAN, LYNCH & CANCIENNE  
PLLC**

Michael Cancienne  
State Bar No. 24055256  
Kevin Jordan  
State Bar No. 11014800  
Joseph W. ("Jeb") Golinkin II  
State Bar No. 24087596  
1980 Post Oak Blvd., Ste. 2300  
Houston, Texas 77056  
713.955.4028  
mcancienne@jlcfirm.com  
kjordan@jlcfirm.com  
jgolinkin@jlcfirm.com

*Co-Counsel for Alta Power  
LLC*

By: /s/ Andrew P. LeGrand

**GIBSON, DUNN & CRUTCHER LLP**

John T. Cox III (Tex. Bar No. 24003722)  
Andrew LeGrand (Tex. Bar No. 24070132)  
2001 Ross Avenue, Suite 2100  
Dallas, Texas 75201-2911  
Tel: 214.698.3100  
TCox@gibsondunn.com  
ALegrand@gibsondunn.com

Eric T. Haitz (Tex. Bar No. 24101851)  
811 Main Street, Suite 3000  
Houston, Texas 77002  
Tel: 346.718.6600  
EHaitz@gibsondunn.com

*Attorneys for General Electric International, Inc.*